

## MEMORANDUM

To: Michael Poland

From: Karina Fidler  
Kimley-Horn and Associates, Inc.

Date: February 10, 2020

Subject: Summary of Responses to Agency Comments on Bridge Upland's IS/MND

---

The Bridge Upland IS/MND was transmitted to the State Clearinghouse for distribution to state and regional agencies for review and comment, and was sent directly to neighboring cities. Among the agencies which reviewed the MND were the California Air Resources Board and the California Department of Transportation, which provided no comments. Comments were received from the South Coast Air Quality Management District ("SCAQMD"), the California Department of Fish and Wildlife ("CDFW"), and the Cities of Claremont and Montclair. In response to those comments, supplemental analyses and new project design features and mitigation measures were added to the Project. Below is a summary of the comments received, and the additional information and measures that were added to the IS/MND to make the project even more sustainable and protective of the environment in response to comments.

### California Department of Fish and Wildlife

Comment	Response
1. Requested additional site assessment for potential burrowing owl habitat	<p><b>Completed in response to comments</b></p> <ul style="list-style-type: none"><li>• Rocks Biological Consulting, a second and independent firm from ELMT Consulting (which prepared the IS/MND's Habitat Assessment), conducted an additional site visit in January 2020 and provided a memo, the <b>Supplemental Project Field Survey</b>, that was added to the IS/MND as Attachment 5 of the responses.</li><li>• Rocks agreed with CDFW that the Project site does contain suitable habitat for burrowing owl.</li><li>• Rocks concurred with the assessment in the IS/MND that there is no potential for federally or state-listed threatened or endangered plant or wildlife species to occur on the project site.</li></ul>

### California Department of Fish and Wildlife

Comment	Response
2. Requested added mitigation to require surveys for burrowing owl prior to construction activities	<b>Added in response to comments</b> <ul style="list-style-type: none"> <li>New Mitigation Measure BIO-2 added requiring: <ul style="list-style-type: none"> <li>Two avoidance surveys for burrowing owls prior to any ground disturbance, completed 14 days and 24 hours prior to any construction activities, and</li> <li>Compliance with non-disturbance protocols established by CDFW if owls are found on site.</li> </ul> </li> </ul>
3. Requested mitigation for disturbed Riversidian Alluvial Fan Sage Scrub (RAFSS) now categorized as scale broom scrub	<b>Added in response to comments</b> <ul style="list-style-type: none"> <li>New Mitigation Measure BIO-3 added</li> </ul>

### South Coast Air Quality Management District

Comment	Response
1. Requested preparation of a Health Risk Assessment	<b>Completed in response to comments</b> <ul style="list-style-type: none"> <li>A Health Risk Assessment ("HRA") was completed in response to this request, and added to the IS/MND as Attachment 3.</li> <li>Cancer risk would be 1.92 in a million, which is well below the SCAQMD-adopted threshold of 10 in one million, which was established by SCAQMD to be protective of public health.</li> <li>An HRA was not originally prepared because the project does not meet the SCAQMD's criteria for preparation of an HRA: 1) it is more than 1,000 feet from a sensitive receptor, and 2) is not a primary generator of diesel emission, since 98% of the project's trips are autos, and the project is limited to only 25 truck per day.</li> </ul>

### South Coast Air Quality Management District

Comment	Response
<p>2. Question about the project's analyzed trip length, and whether the default 20-mile trip length in CalEEMod should be used</p>	<p><b>Addressed in response to comments</b></p> <ul style="list-style-type: none"> <li>The 20-mile default trip length in CalEEMod is for <u>construction haul truck trips</u>, and doesn't apply to the project's operations.</li> <li>The MND's analysis <u>used three different one-way distances</u>: a 6.9-mile trip length, an 8.4-mile trip length, and a 16.6-mile trip length.</li> <li><b>The average trip length in the project's analysis was <u>12.6 miles one-way</u>; therefore, the average length in the MND's analysis was <u>25.2 miles round-trip</u>.</b></li> <li>Research conducted for newly-opened last mile warehouses indicates that trip lengths are typically 6 to 9 miles.<sup>1</sup> Therefore, the average one-way trip length of 12.6 miles (25.2 miles round-trip) used for the Project is reasonable and conservative and may overestimate the actual delivery trip length.</li> <li>Finally, the estimated trip length assumed in the IS/MND likely overestimates new vehicle miles because it assumes that all trips to and from the Project are "new", rather than replacement or redistribution of trips that already exist. For example, the Project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this Project's proposed last-mile facility, and from greater polluting diesel trucks rather than the project's smaller and cleaner vans.</li> </ul>
<p>3. Requested new sustainability commitments</p>	<p><b>Added in response to comments</b></p> <ul style="list-style-type: none"> <li>Added a number of new green measures, including the following:  PDF-GHG-1: Rooftop solar that is projected to result in <u>net-zero electricity consumption</u> by the project building.</li> </ul>

<sup>1</sup> Logistics Management, Last-Mile Deliveries Tend To Run Closer to 6-to-9 Miles, Says CBRE Research, July 13, 2017.

Available at: [https://www.logisticsmgmt.com/article/last\\_mile\\_deliveries\\_tend\\_to\\_run\\_closer\\_to\\_6\\_to\\_9\\_miles\\_says\\_cbre\\_research](https://www.logisticsmgmt.com/article/last_mile_deliveries_tend_to_run_closer_to_6_to_9_miles_says_cbre_research), accessed January 23, 2019 and CBRE, What is the Last Mile?, 2018. Available at: <http://www.cbre.us/real-estate-services/real-estate-industries/omnichannel/the-definitive-guide-to-omnichannel-real-estate/retailing/what-is-the-importance-of-the-last-mile>, accessed January 23, 2019.

### South Coast Air Quality Management District

Comment	Response
	<p>PDF-GHG-2: Electric vehicle (EV) charging stations to service 30 parking spaces.</p> <p>PDF-GHG-3: EV-ready spaces for all truck parking spaces and loading docks, all van parking spaces, and 50% of car parking spaces.</p> <p>PDF-GHG-4: The Project shall include 1,000 trees throughout the parking lot and landscaped areas around the Project site.</p> <p>PDF-GHG-5: The Project shall use all electric powered forklifts.</p> <p>PDF-GHG-6: Electric landscaping equipment, such as lawn mowers and leaf blowers, shall be used on-site.</p>

### City of Claremont

Comment	Response
<p>1. Requested study of traffic impacts using:</p> <ul style="list-style-type: none"> <li>Western Riverside Council of Governments (WRCOG) rates, and</li> <li>High Cube Fulfillment Center ITE Rate</li> </ul>	<p><b>Completed in response to comments</b></p> <ul style="list-style-type: none"> <li>All Project trips <u>go down</u> using WRCOG rates</li> <li>AM peak hour and daily trip numbers <u>go down</u> using High Cube ITE Rate; PM trip numbers go up, but impacts remain less than significant</li> <li>The Institute of Transportation Engineers (ITE) is the authority on trip generation used by every lead agency in California. The project's traffic study used ITE's High Cube Parcel Hub warehouse trip rate which reflects delivery/shipping warehouses engaged in package delivery directly to customers, and therefore is an appropriate rate for the project's trip generation.</li> </ul>
<p>2. Requested additional description of project operations</p>	<p><b>Completed in response to comments</b></p> <ul style="list-style-type: none"> <li>The project will be a Last Mile warehouse, which is the <u>last</u> step in the warehouse supply chain before a package reaches a customer.</li> <li>The project is not a Fulfillment Center, which is one of the <u>first</u> steps in the warehouse supply chain. Boxes are packed in Fulfillment Centers, and then shipped to another</li> </ul>

## City of Claremont

Comment	Response
	<p>warehouse. Amazon's most recent Fulfillment Centers are generally between 500,000 to 1,200,000 square feet in size.</p> <ul style="list-style-type: none"> <li>• Last Mile warehouses are much smaller in size, and have much different operational and site characteristics, than any Amazon Fulfillment Center in the region which are: <ul style="list-style-type: none"> <li>○ Much larger in size (600,000 to 1,200,000 square feet) than the proposed project (201,000 square feet)</li> <li>○ Much higher up in the logistics chain, meaning that they receive and ship product to other warehouses, not to customers</li> <li>○ Have goods arrive and depart by trucks (not vans as proposed by the project)</li> </ul> </li> </ul>
<p>3. Consider taking trip counts at Amazon's Chino warehouse</p>	<p><b>Addressed in response to comments</b></p> <p>There is one Last Mile delivery station in Chino. However based on a review of the site's operational characteristics, surveys at this warehouse would not provide an accurate representation of the proposed project for several reasons –</p> <ol style="list-style-type: none"> <li>1. This warehouse shares its driveway with Motivational Fulfillment &amp; Logistics Services, so there is no way to separate trips to/from the Amazon warehouse vs. the other facility.</li> <li>2. The Chino facility has very limited automobile parking. This results in queuing on the streets and the same vehicles entering and exiting within minutes searching for parking spaces. Therefore, driveway counts at this facility will result in over-estimation of trips. In comparison, the project site has ample parking and a total of 50.25 acres of land area so there will be no queuing on the public streets or multiple trips in and out of the site by employees looking for parking.</li> <li>3. The Chino facility uses a very high proportion of Amazon Flex deliveries, meaning drivers using their personal vehicles (cars) rather than Amazon vans. Because cars have a much smaller carrying capacity than Amazon vans, they must make many more trips back and forth to the warehouse to pick up goods for</li> </ol>

### City of Claremont

Comment	Response
	delivery resulting in a much higher number of trips, versus an Amazon van which can load up more boxes and much more efficiently plan a single delivery route with multiple customer delivery routes without the need to return to the facility. The proposed project will be using vans as noted by the large number of van parking spaces on the project site plan.
4. Review truck trip distribution	<b>Completed in response to comments</b> <ul style="list-style-type: none"> <li>The project is anticipated to generate only 1 truck during each of the AM and PM peak hours, given the Project's limitation of only 5 trucks during the day. Regardless of the direction of travel, this would not cause a significant impact.</li> </ul>
5. Review vehicle mix used	<b>Completed in response to comments</b> <ul style="list-style-type: none"> <li>Vehicle mix used is comparable to the vehicle mix identified by the City of Claremont, which is 98% cars/vans daily, and 2% trucks daily.</li> </ul>
6. Identify City jurisdiction of each related project	<b>Completed in response to comments</b> <ul style="list-style-type: none"> <li>City identified in table of related projects</li> </ul>

### City of Montclair

Comment	Response
1. Concern about truck use of Central Ave.	<b>Addressed in response to comments</b> <ul style="list-style-type: none"> <li>The project is anticipated to generate only 1 truck (2 trips, one inbound and one outbound) during each of peak hours, given the Project's limitation of only 5 trucks during the day. Most of the Project's trucks would travel to and from the freeways at night, well outside the peak hours, when the least number of vehicles are on the road. As a result, no significant impacts are anticipated at any of the intersections within the City of Montclair, as noted in the traffic study.</li> </ul>